

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

WILLIAM E. YOUNG

Case No.

2:17-MJ-425

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 2008 - 2017 in the county of Franklin in the
Southern District of Ohio, the defendant(s) violated:

Code Section

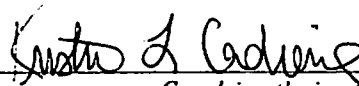
18 U.S.C. 2261A(2)

Offense Description

Cyberstalking

This criminal complaint is based on these facts:

Please see attached affidavit.

☒ Continued on the attached sheet.*Complainant's signature*

Kristin L. Cadieux, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: _____

City and state: Columbus, Ohio*Judge's signature*

Hon. Elizabeth P. Deavers, U.S. Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN THE MATTER OF THE
CRIMINAL COMPLAINT OF:**

MISC. NO. _____

WILLIAM E. YOUNG

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Kristin L. Cadieux, Special Agent, Federal Bureau of Investigation, being duly sworn, hereby depose and state as follows:

Introduction and Purpose

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed for approximately eighteen years. I have received specialized law enforcement training from the FBI. I have investigated violent crimes, to include crimes involving narcotics, robberies, kidnappings, and human trafficking, as well as other violent crimes.
2. I make this affidavit in support of a criminal complaint to arrest WILLIAM E. YOUNG ("YOUNG") for the violation of 18 U.S.C. § 2261A(2) – cyberstalking. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, your affiant did not include each and every fact known concerning this investigation. Your affiant did not withhold any information or evidence that would negate probable cause. Your affiant set forth only the facts that are believed to be necessary to establish probable cause that YOUNG committed the violation listed above.
3. Based upon my experience and the facts presented in this Affidavit, I contend that there is probable cause to believe that YOUNG, with the intent to harass or intimidate, or place under surveillance with intent to harass or intimidate, unlawfully cyberstalked victims R.M. and J.M., by using the mail, any interactive computer service, and/or any facility of interstate or foreign commerce, to engage in a course of conduct that caused, attempted to cause, or would be reasonably expected to cause substantial emotional distress to victims R.M. and J.M., and place them in reasonable fear of death or serious bodily injury, in violation of 18 U.S.C. § 2261A(2).

Facts Supporting Finding of Probable Cause

4. On or about October 15, 1999, YOUNG was arrested for menacing by stalking a female

(hereafter referred to as Victim A) in Delaware County, Ohio. One of the arresting officers (hereafter referred to as R.M.), has been continuously stalked and harassed by YOUNG through multiple methods since YOUNG's 1999 arrest and conviction.

5. One method utilized by YOUNG to engage in a course of conduct to harass or intimidate R.M. is the Internet. YOUNG has initiated at least four websites:

www.delawaresherifffrusmartinisapedaphile.com
www.delawareohiopolicechiefusmartinisacriminalforprostitutes.com
www.delawaresherifffrusmartin-barneyfifepatronizesprostitutes.com
www.tamarachafinshamanskywasaprostitute.com

- a. The only website directed at R.M. with a traceable domain name is www.delawaresherifffrusmartinisapedaphile.com. The domain registrar is GoDaddy.com, LLC. Records received from GoDaddy.com, LLC confirmed that YOUNG is the sole registrant of this website, which was controlled by YOUNG from on or about December 30, 2012 to August 18, 2016, and expired on or about December 30, 2016.
- b. According to internet archive captures and witnesses who viewed the websites, the websites depicted/contained the same and/or similar written materials that YOUNG mailed out to R.M., his family, law enforcement, and community members, as described in more detail below.
- c. Subsequent letters sent by YOUNG, described in more detail below, referenced the above-listed websites. Within these letters that refer to the websites, YOUNG stated, among other things, "Tell everyone you know!" and "When this prostitute refused to see [R.M.]/Fife [referring to Barney Fife] anymore because he was too "obsessed" with her he "sexually molested" his daughter [printed daughter's name]." YOUNG further stated, "This website is dedicated to exposing Delaware County (OH) Sheriff [R.M.]/Barney Fife for the pedophile, stalker, and corrupt cop he is."
6. Another method utilized by YOUNG to engage in a course of conduct to harass or intimidate R.M. is the mail. Beginning in or about March 2008 through and including the present, YOUNG has sent letters and documents about R.M. to various individuals and businesses, including but not limited to: R.M.; R.M.'s spouse (hereafter referred to as J.M.) and family; neighbors; local community businesses, including R.M.'s physician and barber; R.M.'s church; R.M.'s church pastor and pastor's wife; Ohio Wesleyan College; Delaware City Hall; the Delaware Chamber of Commerce; the Delaware City Mayor; Delaware City Council members; the Delaware Police Department; the Delaware County Sheriff's Office; the Delaware County Jail; and the Arapahoe County Prosecutor's Office. Your affiant is aware of approximately 60 known letters sent via mail; however, this count is generated strictly by letters brought to the attention of law enforcement by recipients.
7. While there have been several different return addresses found on the envelopes containing the letters and, in some cases, no return address at all, the material within those letters has remained consistent over the past 17 years. The return address listed on the most recent mailings is Post

Office Box 255, Worthington, Ohio 43085. The United States Postal Inspector confirmed that Post Office Box 255, Worthington, Ohio 43085 has been registered to YOUNG since on or about March 27, 2012. A mail cover was conducted on that post office box from on or about February 22, 2017 through March 23, 2017. Other than generic mailers not addressed to a specific person (e.g., "Current Resident"), YOUNG was the sole recipient of mail at that post office box.

8. An example of a letter YOUNG is known to have mailed approximately 5 times was what he referred to as a "Chain Letter." In the letter, YOUNG states, "make copies of this and pass it on!" YOUNG refers recipients to two of the above-listed websites: www.delawaresheriff.russmartinisapedaphile.com and www.tamarachafinshamanskywasaprostitute.com. YOUNG further states in the letter, "[R.M.] sexually molested [R.M.]'s daughter after this prostitute would no longer see him and satisfy his 'sexual urges' because he was becoming too 'obsessed' with her."
9. Another example of a letter YOUNG is known to have mailed approximately 7 times was a series of cartoon characters where YOUNG superimposed R.M.'s face on the bodies of the characters. Within these cartoons, YOUNG has a male character pointing at R.M.'s character stating, "Listen here. I'd smash your face only you're so skinny you might dry up and blow away." The letter further states, "Even worse, a gay wimp [R.M. character] who wants to hide behind a gun and badge because he's a little pussy. I'm gonna kick your 'puny' ass! . . . When judgement day comes for you make sure they pack an air conditioner in your coffin. You'll need it."
10. Another example of a letter YOUNG is known to have mailed approximately 34 times was a letter and CD that included YOUNG's written opinion of both R.M. and Victim A, as well as portions of copied court records related to YOUNG's 1999 arrest and documents from a 2006 civil lawsuit that he filed against R.M. and a fellow officer. These letters varied in length from 3 pages to 92 pages. Within these letters YOUNG writes, among other things, that R.M. persecuted YOUNG because YOUNG was a client of Victim A when she was a prostitute.
11. On or about September 28, 2015, YOUNG sent a 62-page letter to R.M.'s spouse, J.M. Within this 62-page document, one quote is: "As stated previously, YH [your husband] is a *low-life piece of shit/scumbag, pervert and a moron/dullard/nimrod*, and not at all who he claims to be." YOUNG's letter further states, "If he chooses not to do that, I'll force his hand if the powers that be make the mistake of coming after me again. Then I'll take everyone down who had a hand in what was done to me one by one."
12. YOUNG also sent R.M.'s family a Christmas card to their home address on or about December 17, 2015, which depicted a Santa Claus cartoon character that appeared to be angry, and also included multiple copies of court documents related to YOUNG's 1999 stalking arrest and conviction.
 - a. With respect to the 1999 stalking conviction, YOUNG was sentenced to 30 days of confinement with 25 of those days suspended, meaning he was incarcerated for 5 days total for this conviction. On or about March 29, 2000, the Delaware Municipal Court

judge ordered a hearing on the matter of YOUNG having had further contact with Victim A, a violation of the terms of his release. The court ordered a psychological evaluation with follow-up, if recommended. YOUNG, however, did not comply with the court's order. On or about August 29, 2000, the court ordered YOUNG to serve the balance of his sentence for failing to comply with the court's order, as well as for failing to report to probation on three separate occasions.

13. A letter that was sent to the Delaware County Sheriff's Office (exact date unknown) referenced a December 10, 2014 news article in which R.M. is referenced going to the White House in Washington, D.C. to speak at a summit for "Invest in US." The letter further states, "*You're a pussy!!! My cell phone number is 614-787-7105. Call me and I'll meet you anywhere other than in Delaware and give you the ass-whipping you have earned!! Man the fuck up or SHUT UP!!!*" The cell phone number referenced above is the number subscribed to by YOUNG and all content in this package is consistent with all other described packages from YOUNG.
14. YOUNG recently sent a letter to J.M., addressed to R.M. and J.M.'s residence, on or about July 10, 2017. The letter had the same return address as the other known letters, Post Office Box 255, Worthington, Ohio 43085. Within this letter, YOUNG included copies of miscellaneous police reports related to his 1999 stalking arrest and conviction. The letter also included Wikipedia definitions of "Pseudologia Fantastica" and "Pathological Liars," in reference to R.M., and two news articles that discuss R.M. as it pertains to his job. These documents mirrored documents that have been sent in the past to various individuals. In this July 10, 2017 mailing, however, YOUNG also included new material not known to be sent in the past, such as a printout of federal law statutes quoting "police misconduct laws enforced by the Department of Justice" in reference to R.M.
15. The most recent known letter was sent to R.M.'s pastor on or about July 15, 2017. This last letter is approximately the seventh letter received by the R.M.'s pastor. This letter included much of the same comments, police reports, news articles, and court documents as in past letters. However, in this letter, YOUNG stated, "I would like to sit down and talk to you about this. Please call me at (614) 787-7105 or contact me via email at bodeie@yahoo.com."
16. In addition, on or about May 3, 2010, YOUNG was interviewed by two Special Agents with the Ohio Bureau of Criminal Identification and Investigation (BCI). According to their investigative report, during the interview YOUNG was asked about sending a series of disparaging business cards to individuals. The business cards stated several things, for example: "Exposing Corruption. Are you a victim of police corruption like me or know anyone who has been? If so contact me, William Young, at bodeie@yahoo.com, 614-787-7105. Read my story of police corruption on behalf of a prostitute whose clients were politicians, judges, cops and lawyers @ www.tamarachafinshamanskywasaprostitute.com." YOUNG's response was that he did this "to drive people to the websites" (referring to the above-listed websites about R.M. and Victim A). YOUNG also stated to the BCI Special Agents, "I want him [R.M.] fired. I want him to eat his gun."

17. Over the last decade, YOUNG has filed multiple state and federal civil lawsuits against R.M., another arresting officer from YOUNG's 1999 arrest, and the Delaware Police Department, alleging various claims of corruption and fraud.
18. R.M. has, and continues to battle with emotional distress from the ongoing intimidation and harassment by YOUNG. R.M. provided the following examples:
 - a. R.M. has significantly changed his lifestyle over the last 17 years due to YOUNG's behavior. R.M. noted that talking and thinking about YOUNG causes his blood pressure to rise and his heart rate to increase. R.M. wonders how much his experience with YOUNG has aged him.
 - b. R.M. lives wondering if YOUNG is going to be in his bushes when he opens the garage door to leave his home. R.M. always makes sure his gun hand is free in the event that he would need to quickly draw his weapon.
 - c. R.M. has installed security cameras at his residence within the last year, and reviews that footage before he arrives home and before he opens any blinds within his residence.
 - d. While R.M. was running for public office in 2012, he was forced to provide information about YOUNG to the community and City Council explaining the situation.
 - e. R.M. recalled a time when he was in his residence with his wife at dusk and he heard gunfire from a long gun. He described the terror he felt when he thought it was YOUNG firing into their residence. He directed his wife to get down on the ground while he fast-crawled across the floor to get back to his bedroom and retrieve his gun. After a period of time, R.M. realized the gunfire was generated from another source; however, he feels that he must always be on guard due to YOUNG's behavior.
 - f. R.M. states the mailed communications, primarily the chain letters referenced in paragraph 9, which referenced a pedophilic relationship with his daughter, have been very emotionally stressful for him and his spouse, J.M. The letter states, in part, "[R.M.] sexually molested [R.M.]'s daughter after this prostitute [Victim A] would no longer see him and satisfy his 'sexual urges' because he was becoming too 'obsessed' with her." YOUNG also references R.M.'s alleged molestation of his daughter in a letter he sent to the Delaware County Sheriff's Office on or about March 31, 2014, in which he states, "she [Victim A] told me about a police officer who became so *obsessed* with her when she stopped seeing him as a prostitute he molested his daughter. I have no doubt whatsoever [Victim A] was referring to [R.M.]."
 - g. R.M. used to have an assigned parking spot for his job, which identified his official title. R.M. had this parking spot re-assigned so that YOUNG would not know where he parked. When R.M. walks to his vehicle at work, he scans 360 degrees around himself, keeps his gun hand free, has his car keys in the other hand ready to go, and looks for cover, concealment, and an exit strategy at all times.


- h. R.M. has stated, for the above-listed reasons, that he is, at minimum, in constant fear of being seriously injured by YOUNG and, at maximum, afraid for his and his spouse J.M.'s lives.
19. R.M.'s spouse, J.M., has and continues to battle with emotional distress from the ongoing intimidation and harassment by YOUNG. J.M. provided the following examples:
- a. In reference to her overall experience in relation to YOUNG, J.M. relayed that YOUNG has had a significant impact on her life. The first time J.M. heard about YOUNG was when R.M. informed her that YOUNG was accusing him of having sex with a female outside of a courtroom and that this female was a prostitute. Although she did not believe the accusations, this was very disturbing to R.M.
 - b. J.M. is always concerned about staying alone in her residence and will often ask her adult son to come home when R.M. is not home.
 - c. J.M. states that YOUNG is the sole reason they have installed security cameras within their residence and placed security alarm stickers on all of their windows to warn anyone who comes close to their residence.
 - d. J.M. has received several letters in her residential mailbox over the 17 years, which has always been concerning to her since she realizes YOUNG is clearly aware of where they live.
 - e. J.M. also recalled the above-described incident where she and R.M. heard gunfire near their residence. This was very upsetting for J.M. as well.
 - f. J.M. has viewed the above-described website regarding R.M., as well as all of the letters she has received from YOUNG. She states this material is very sickening and simply disgusts her. She was particularly disgusted by letters that she saw that had sexually graphic pictures depicting R.M. having sex with a baby.
 - g. J.M. also recalled a Christmas card their family received from YOUNG on or about December 17, 2015, which she described as "creepy."
 - h. Another set of letters J.M. read bothered her because the letters seemed to try to draw R.M. into confronting YOUNG by stating "come get me."
 - i. J.M. has stated, for the above-listed reasons, that he is, at minimum, in constant fear of being seriously injured by YOUNG and, at maximum, afraid for her and R.M.'s lives.

Conclusion

20. The evidence above indicates there is probable cause to believe that YOUNG, with the intent to harass or intimidate, or place under surveillance with intent to harass or intimidate, unlawfully cyberstalked victims R.M. and J.M., by using the mail, any interactive computer

service, and/or any facility of interstate or foreign commerce, to engage in a course of conduct that caused, attempted to cause, or would be reasonably expected to cause substantial emotional distress to victims R.M. and J.M., and place them in reasonable fear of death or serious bodily injury, in violation of 18 U.S.C. § 2261A(2).

FURTHER AFFIANT SAYETH NAUGHT.


KRISTIN L. CADIEUX
Special Agent, FBI

Subscribed and sworn to before me,
this 7th day of August 2017.


HONORABLE ELIZABETH PRESTON DEAVERS
UNITED STATES MAGISTRATE JUDGE